



June 17, 2020

Mr. Trey Price and Ms. Marisa Button
Florida Housing Finance Corporation
227 N. Bronough Street, Suite 5000
Tallahassee, FL 32301

RE: Proposed Goal for the 2020/2021 Housing Credit Financing for Affordable Housing Developments Located in Medium and Small Counties (“Small/Medium RFA”) – 2020/2021 RFA General Process

Dear Mr. Price and Ms. Button,

The Agendas provided for the March 5, 2020 and May 29, 2020 RFA Funding Cycle Workshops specific to the Request for Applications for Housing Credit Financing for Affordable Housing Developments Located in Medium and Small Counties included a goal to fund one (1) application that qualified for being a 100% Non-Profit (the “Non-Profit Goal”). At the May 29, 2020 Workshop, Ms. Button verbally indicated that the Corporation had decided to remove the Non-Profit Goal from consideration.

In lieu of the Corporation’s decision, HTG recommends that the Corporation consider a goal to fund one (1) application that is the subsequent phase to a multiphase development (the “Multiphase Development Goal”). Multiphase developments:

- 1) Are less-risk high-reward investments to developers and to the Corporation as the first phase often captures the majority of the risk profile associated with entering into new markets that may have pre-existing economic factors and conditions;
- 2) Help promote economies of scale which include lower operating expenses in addition to helping developers and their partners carry out larger-scale visions that benefit the community and local economy while adding more affordable housing units; and
- 3) Are stronger performing assets financially, which benefits lenders, including the Corporation in SAIL and bond transactions, underwrite and leverage their feasibility which in turn leads to less extension requests by developers.

Both the Request for Applications and the Carryover Allocation Agreements already contemplate additional phases and the Federal Register also already defines what qualifies as a “multiphase project” so integration on the part of the Corporation would be seamless. HTG encourages the Corporation to consider adding the Multiphase Development Goal to the Small/Medium RFA as doing so would help the Corporation fully leverage its portfolio of existing prior phases by promoting the development of less-risk high-reward subsequent phases.

Respectfully submitted,

Housing Trust Group, LLC,
a Florida limited liability company

By: 
Matthew Rieger, Manager